

Varghese & Associates, P.C.

2 Wall Street
New York, NY 10005
(212) 430-6469

www.vargheselaw.com

March 13, 2023

VIA ECF

The Honorable Hector Gonzalez
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States of America v. Jian Ai Chen
Docket No. 21 cr. 494 (HG)

Dear Judge Gonzalez:

With no objection from the government, Ms. Chen respectfully requests that the Court allow her to withdraw her guilty plea and dismiss the docket. Ms. Chen can show *a fair and just reason for requesting the withdrawal*. FED. R. CRIM. P. 11(d)(2)(B). During critical periods which led to her accepting the prior plea agreement and pleading guilty before the Honorable Raymond J. Dearie, Ms. Chen was not advised by an attorney.

As discussed during last week's appearance and previously before Judge Dearie, during crucial stages of representation by Ms. Chen's prior counsel, including but not limited to signing the plea agreement, Ms. Chen was not advised by her then lawyer, but instead by a paralegal. Thus, Ms. Chen has shown a fair and just reason for requesting the withdrawal.

Accordingly, she requests that the Court allow her guilty plea withdrawal and dismiss the docket. Ms. Chen thanks the Court for consideration of her request.

Respectfully submitted,

Varghese & Associates, P.C.

/s/

By: Vinoo P. Varghese

Counsel for Ms. Jian Ai Chen

cc: Ms. Jian Ai Chen
Government via ECF
Senior U.S. Probation Officer Jennifer G. Fisher via email